1	GIA N. MARINA	
2	Nevada Bar No. 15276 CLARK HILL PLLC	
3	3800 Howard Hughes Drive, Suite 500 Las Vegas, Nevada 89169	
4	E-mail: gmarina@clarkhill.com Telephone: (702) 862-8300	
5	Facsimile: (702) 778-9709 Attorney for Defendant	
6	Equifax Information Services LLC	
7		
8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
9	DOCALINA CHA AVOV	Case No. 2:22-cv-01834-GMN-DJA
10	ROSALINA SHAAKOV,	Case No. 2.22-cv-01034-GWIN-DJA
11	Plaintiff,	
12	vs.	JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT EQUIFAX
13	EQUIFAX INFORMATION SERVICES, LLC,	INFORMATION SERVICES LLC TO FILE ANSWER
14	FREEDOM FINANCIAL ASSET MANAGEMENT LLC DBA FREEDOM	
15	PLUS and CLARK COUNTY CREDIT	FIRST REQUEST
16	UNION,	
17	Defendants.	
18		
19	Defendant Equifax Information Services LLC ("Equifax") has requested an extension of	
20	time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has	
21	no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED	
22	to by and among counsel, that Defendant Equifax Information Services LLC's time to answer,	
23	move or otherwise respond to the Complaint in this action is extended from November 25, 2022	
24	through and including December 27, 2022 . The request was made by Equifax so that it can have	
25	an	
26	//	
27	//	
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1	opportunity to collect and review its internal files pertaining to the allegations in the Complaint,		
2	and Plaintiff approves. This stipulation is filed in good faith and not intended to cause delay.		
3	Respectfully submitted, this 24 th day of November, 2022.		
4			
5	CLARK HILL PLLC	Services LLC	
6	By: /s/Gia N. Marina	No opposition	
7	Gia N. Marina Nevada Bar No. 15276	<u>/s/Michael Kind</u> Michael Kind, Esq.	
8	3800 Howard Hughes Pkwy,	Nevada Bar No. 13903	
9	Suite 500 Las Vegas, NV 89169	KIND LAW 8860 South Maryland Parkway, Suite 106	
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11	Address on face Defendant Englished Information	Email: mk@kindlaw.com	
12	Attorney for Defendant Equifax Information	George Haines, Esq.	
13		Nevada Bar No. 9411	
14		Gerardo Avalos, Esq. Nevada Bar No. 15171	
15		HAINES & KRIEGER, LLC	
16		8985 S. Eastern Ave., Suite 350 Henderson, NV 89123	
		Phone: (702) 880-5554	
17		Fax: (702) 385-5518	
18		Email: ghaines@freedomlegalteam.com Email: gavalos@freedomlegalteam.com	
19		Attorneys for Plaintiff	
20		Theomes you I tallings	
21			
22	IT IS SO ORDERED:		
23			
24	United States Magistrate Judge		
25	DATED:11/29/2022		
26			
27			
28			

CERTIFICATE OF SERVICE I hereby certify that a true and exact copy of the foregoing has been served this 24th day of November, 2022, via CM/ECF, upon all counsel of record: By: /s/ Gia N. Marina Gia N. Marina Nevada Bar No. 15276 3800 Howard Hughes Pkwy, Suite 500 Las Vegas, NV 89169 Tel: (702) 862-8300 Fax: (702) 862-8400 Email: gmarina@clarkhill.com